

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Jack W. Wolf

Plaintiff

v.

C/O Pusey, C/O Carter and Lt. Seacord
Defendants

C. A. No. 04-1385-GMS

AFFIDAVIT OF THOMAS SEACORD

I, Thomas Seacord having been duly sworn according to law, do hereby depose and state as follows:

1. I am employed by the State of Delaware, Department of Correction ("DOC") at the Delaware Correctional Center ("DCC") Smyrna, Delaware as a Correctional Lieutenant. I commenced employment on May 22, 1989. Among my responsibilities are Multi Disciplinary Team Chair of the Security Housing Unit and Maximum Housing Unit.

2. I make this affidavit based upon my personal knowledge.

3. On July 28, 2004, a little after 1310 hours I responded to a call that an inmate was non-compliant and refusing to lock-in his cell as directed. As I entered the observation room building 22, I observed Inmate Wolf acting in a noisy way.

4. I instructed him to calm down so that I could find out what was happening. Inmate Wolf continued to act in a hostile way, as he repeatedly shouted profanity and refused orders to calm down. He seemed to complain about having back pain and that he could not stand up.

4. Officer Raney explained to me that inmate Wolf had been seen by medical previously, and that they did not find anything wrong.

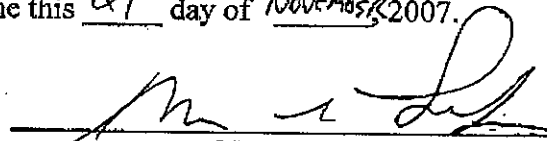
5. Inmate Wolf continued to exhibit his anger while in handcuffs. He yelled, "f—k (expletive) you bitches and lunged at me while I was standing in front of him. The correction officers in the room grabbed Wolf by the arms and pulled him away from me and sat him down. I left the observation room after back up officers were called to transport inmate Wolf to isolation confinement. I went to my office and called the shift commander to make a report of this incident.

6. At no time did I hit Inmate Wolf in the head or body. I did not observe inmate Wolf being slammed on a cart, or being abused by any staff at any time.

7. I and staff responded with the appropriate use of force necessary to restore and maintain order without injury to staff or inmates.


Thomas Seacord

SWORN TO AND SUBSCRIBED before me this 21 day of November 2007.


Notary